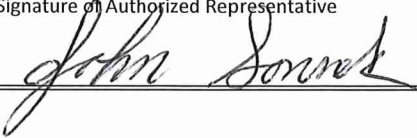


BROADBAND EXPANSION GRANT APPLICATION

For Fiscal Year 2022

Primary Applicant (Name and Address): Indianhead Telephone Company, dba Bevcomm 123 W 7th St Blue Earth, MN 56013	Applications MUST be UPLOADED to ERF via the Commission's website, http://psc.wi.gov/apps35/ERF_upload/content/mymenu.aspx . Refer to section 2.3 for detailed instructions. Applications are due and MUST be uploaded to ERF no later than: March 17, 2022 at 4:00pm (16:00) Central Time. Late applications will not be accepted.	
	Contact for further information: PSCStatebroadbandoffice@wisconsin.gov	
	Date: March 17, 2022	
<p>The Public Service Commission of Wisconsin is seeking applications for Broadband Expansion Grants. The Commission may award one or more grants during Fiscal Year 2022 to public and private entities that meet the eligibility requirements set forth in Wis. Stat. § 196.504. This grant round will be funded with bond proceeds authorized by the Wisconsin Building Commission pursuant to Wis. Stat. § 13.48(30). As such, successful applicants are subject to the requirements of Wis. Stat. § 13.48(30). Successful applicants will demonstrate a clear and achievable plan to improve broadband communications services in one or more underserved areas in the State.</p>		
<p>Applicant Certification: In signing this application, the undersigned verifies under penalty of perjury that the Applicant and its employees and agents have not, either directly or indirectly, entered into any agreement or participated in any collusion or otherwise taken any action in restraint of free competition with respect to this application; that no attempt has been made to induce any other person or firm to submit or not to submit an application; that this application has been independently arrived at without collusion with any other proposer, competitor or potential competitor; that this application has not been knowingly disclosed prior to the opening of applications to any other applicant or competitor; that all of the responses and representations of Applicant in this application are true and correct to the best of the undersigned's knowledge, information, and belief; and that Applicant agrees to, accepts, and will comply with all of the terms and conditions respecting this application and any award of a broadband expansion grant as may be established in a grant award Agreement.</p>		
Name of Authorized Representative (Type or Print) John Sonnek	Title Director of Operations	Phone (507) 526-1164
Signature of Authorized Representative 	Date March 17, 2022	

SUMMARY OF GRANT APPLICATION

Primary Applicant Name Indianhead Telephone Company, dba Bevcomm	Amount of Broadband Grant Request (round to nearest dollar) \$1,709,478 (45%)
Federal Employer Identification No. 39-0269310	Amount of Matching Funds Pledged (round to nearest dollar) \$2,089,362 (55%)
Contact Name and Title John Sonnek, Director of Operations	Total Cost of Proposed Project (round to nearest dollar) \$3,798,840
Telephone Number (507) 526-1164	Project Name Rural Exeland Fiber Expansion Project: Phase One
E-mail Address(es) jsonnek@bevcomm.com	Type of Proposed Broadband Service (FTTH, Cable, DSL, etc.) FTTP
Grant Manager, if different than Primary Applicant Same as Primary Applicant	Type of Proposed Project (Last-mile, Middle-Mile, backbone, other) Last Mile
Grant Manager Contact Name Not applicable	Grant Manager Email Address and Telephone Number Not applicable
If the application proposes a public-private partnership, list the names, addresses, and FEINs of the partner companies or organizations Sawyer County, 10610 Main St, Hayward WI, 54843, 39-6005742 Meadowbrook Township, 9436W County Hwy D, Exeland WI 54835, 39-0453549 Rusk County Development, 311 W Miner Avenue, Ladysmith, WI 54848, 39-6005738 Meteor Township, 1440N County Highway C, Exeland WI 54835, 39-1053517	
Brief Project Description (2 sentences) The proposed project will build a new Fiber-to-the-Premise infrastructure from Bevcomm's Exeland Central Office heading west on Hwy 48, north and south on state Hwy 40 and east to Hwy 27 in portions of Rusk and Sawyer Townships. This includes the areas of Deer Lake, Summit Lake, and Windfall Lake.	
Maximum Proposed Download Transmission Speed FTTP: 1 Gbps, and faster	Maximum Proposed Upload Transmission Speed FTTP: 1 Gbps, and faster
Minimum Proposed Download Speed to Customer Location FTTP: 50 Mbps	Minimum Proposed Upload Transmission Speed to Customer Location FTTP: 25 Mbps

County or Counties served by this project Portions of Sawyer and Rusk Counties	Community or Communities served by this project Rural Exeland
List of the broadband service providers, if any, currently serving the area the applicant proposes to serve Bevcomm is the sole wireline provider in the proposed project area.	
Does proposed project serve an <u>unserved</u> area of the State, as defined in <u>Section 1.4</u> of the application instruction? (yes/no) No, this project serves an underserved part of the state.	Is the Applicant certified as a Broadband Forward! Community or Telecommuter Forward! Community, or does the grant project propose to serve a Broadband Forward! Community or Telecommuter Forward! Community? (yes/no) Yes, Sawyer County is a Broadband Forward! Community.
For last mile projects or component the expected number of Business Locations that will have access to the improved broadband service (i.e., total business locations passed or with new service access). There are at least 48 business and 104 teleworkers in the proposed project area.	For last mile projects or components the expected number of Residential Locations that will have access to the improved broadband service (i.e., total residential locations passed or with new service access). There are at least 595 residential households in the proposed project area.
Of the improved business locations, how many locations are <i>unserved</i> ? All business locations are underserved.	Of the improved residential locations, how many are <i>unserved</i> ? All residential locations are underserved.
For providers that are eligible telecommunications carriers will the proposed broadband service be available to Lifeline customers? (yes/no) Yes	Are there any programs available for low-income households to access low-cost service or discounts? (yes/no) Yes
Is the internet service provider currently participating in the Emergency Broadband Benefit Program? (yes/no) Yes, Bevcomm participated in the EBB Program, and now participates in the Affordable Connectivity Program.	Is the internet service provider currently participating in the Department of Public Instruction and CESA purchasing's Digital Learning Bridge? (yes/no) No
Did the internet service provider participate in the Public Service Commission's voluntary Broadband Coverage Data Collection in 2021? (yes/no) Yes	

A Separate file including Supplementary Material to this applications has been submitted.

FY22 Broadband Expansion Grant Application

Budget & Income Summary



Please complete this form using Microsoft Excel. A PDF copy must be attached to your application as page four. In addition, this form must also be uploaded to ERF in Excel format.

Grant Summary

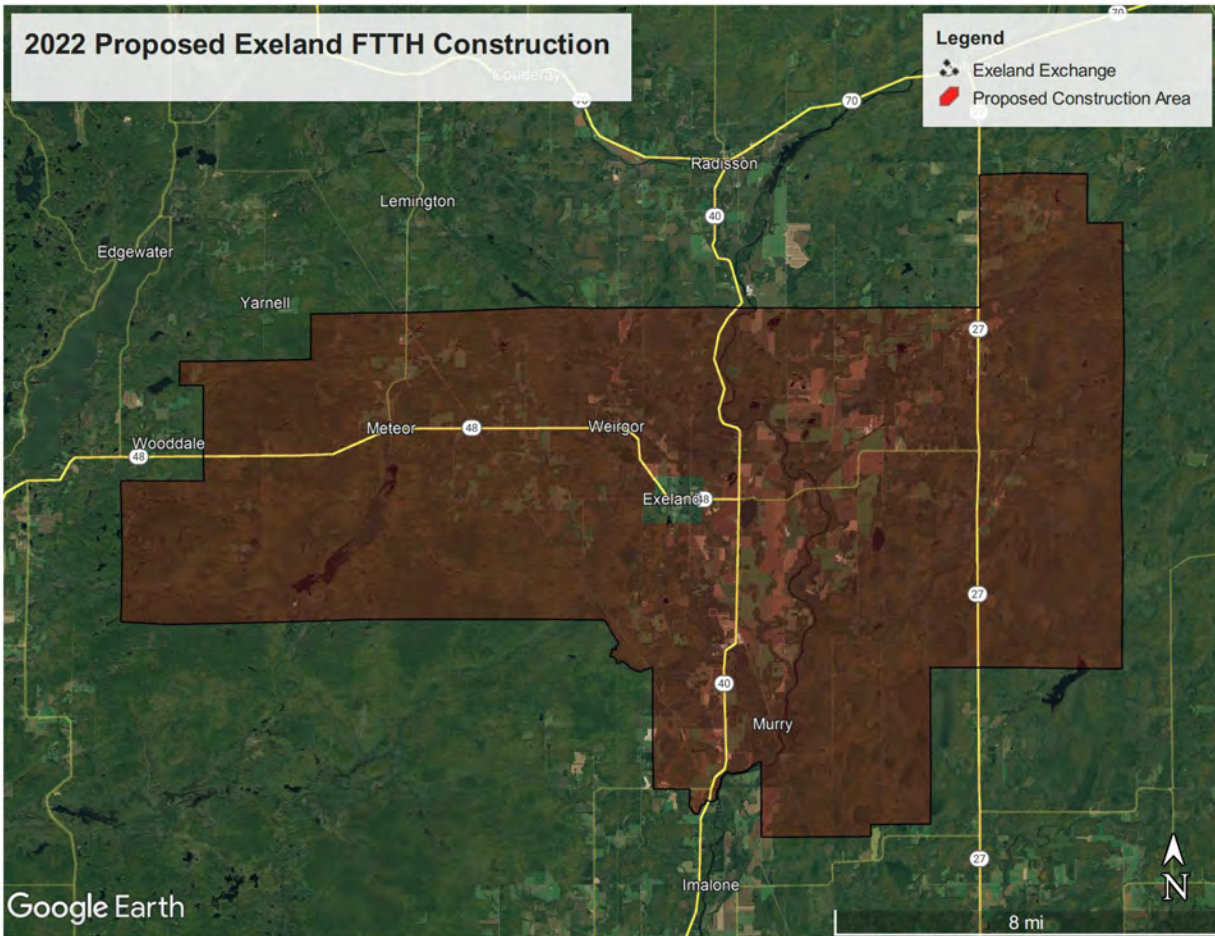
Grant Applicant:	Project:
Indianhead Telephone Company, dba Bevcomm	Rural Exeland Fiber Expansion Project

Budget

Line:	Description / Category:	Grant Funds:	Match:	Total:
1	Contractual, Consultant Fees	\$ 1,260,865.00	\$ 1,541,057.00	\$ 2,801,922.00
2	Equipment	\$ 415,605.00	\$ 507,962.00	\$ 923,567.00
3	Supplies			\$ -
4	Labor (Salary, Fringe)	\$ 28,508.00	\$ 34,843.00	\$ 63,351.00
5	Permitting, Licensing Fees	\$ 4,500.00	\$ 5,500.00	\$ 10,000.00
6	Travel			\$ -
7	Other			\$ -
Total:		\$ 1,709,478.00	\$ 2,089,362.00	\$ 3,798,840.00
55.0% match requested				

Pledged Contributions

#:	Entity:	Entity Type:	Pledge Type:	Pledge:
1	Rusk County	Partner	Cash	\$ 1,000.00
2	Sawyer County	Partner	Cash	\$ 100,000.00
3	Meadowbrook	Partner	Cash	\$ 13,711.58
4	Bevcomm	Applicant	Cash	\$ 1,974,650.42
5				
6				
7				
8				
9				
10				
Total:				\$ 2,089,362.00



Bevcomm is proposing a Fiber-to-the-Premise build in rural Exeland, which includes the northern portion of Rusk County to the southwestern corner of Sawyer County. This includes the areas of Deer Lake, Summit Lake, and Windfall Lake.

The project proposes infrastructure running from our Exeland Central Office going west on Hwy 48, north and south on state Hwy 40, and east to Hwy 27. The project area covers 538 locations in Sawyer County and 105 locations in northern Rusk County. The FTTP technology proposed for this project will supply advanced bandwidth delivery to an expected 643 locations, including at least 48 businesses and at least 104 teleworkers.

Executive Summary

Indianhead Telephone Company, dba Bevcomm, respectfully submits this application for a proposed project titled Rural Exeland Fiber Expansion Project: Phase One. The purpose of this project is to construct a Fiber-to-the-Premise network to 643 locations including at least 48 businesses, 104 teleworkers, and 595 homes. The proposed area includes portions of Rusk and Sawyer Counties. This project will enable data rates of up to 1 Gigabit (1,000 Mbps) to each subscriber on the network. Core services will be deployed utilizing extensive broadband networks including multiple fully redundant 10 Gbps Ethernet transport rings that are constructed to survive fiber cuts and equipment failures. Bevcomm will use a dedicated fiber optic cable architecture along with an Active Ethernet FTTP technology to deliver these ultra-broadband services to its customers.

The estimated cost of the eligible infrastructure is \$3,798,840. Of that total, \$1,709,478 (45%) is requested as grant funding and \$2,089,362 (55%) is pledged by Bevcomm, Sawyer County, Meadowbrook Township, and Rusk County, as an equity contribution. Should we receive funding, Sawyer County has committed to a \$100,000 funding partnership, in addition to a \$13,711.58 commitment from Meadowbrook Township, and \$1,000 from Rusk County. This project will complete the fiber build in 100% of our rural Exeland exchange.

Bevcomm is a fourth generation, family-owned communications company providing cutting edge services for more than 125 years. To date, we have delivered fiber drops to nearly 1,500 homes in Wisconsin and have the expertise and experience to successfully complete the proposed fiber construction project. Bevcomm has been a recipient of 20 state grants, all successfully deployed, in Wisconsin and Minnesota.

Community support for the proposed project has been exceptional. In preparation for this application, we conducted a Fiber Interest Survey of residents living in the proposed project area. We received a 38% response rate and 95% of those who responded reported having a strong interest in this project. Respondents lamented that their less than adequate speeds result in sub-par online education, delayed work-from-home applications, and poor access to telehealth opportunities. They detailed how these experiences were heightened due to the COVID-19 pandemic. An enhanced broadband network will eliminate digital frustrations and limitations that residents currently battle and will provide speeds that will allow them to overcome geographical distances, engage in advanced telehealth options, efficiently and effectively telecommute, and successfully participate in distance learning.

Bevcomm is pleased to have received the support of community members, to have financially partnered with Sawyer County, Meadowbrook Township, and Rusk County, and to have received numerous support letters, including support from Senator Jerry Petrowski and State Representative James Edming. Representative Edming highlights the need for an improved connection in the proposed area saying, "Throughout my time representing the people of the 87th Assembly District, the need for improved high-speed internet access is among the top concerns I hear about from my constituents, including those in the area of this proposed project. The lack of high-speed internet access hurts economic growth, limits educational opportunities, and diminishes the quality of life."

We are please with the Public Private Partnerships reached, and the support of community members who would be greatly impacted by a fiber-build. We thank you for your review of this application.

3.2.1 Applicant identification and contact information

- a. The name and address of the entity applying for the grant, and the mailing address, telephone number and e-mail address of one or more contact persons representing the applicant.

Indianhead Telephone Company, dba Bevcomm
123 W 7th St
Blue Earth, MN 56013

John Sonnek, jsonnek@bevcomm.com, (507) 526-1164
Arlette Dutton, adutton@bevcomm.com, (507) 526-3252

- b. If the application proposes a public-private partnership, the identity and contact information for all application partners.

Bevcomm

John Sonnek, Director of Operations
jsonnek@bevcomm.com
(507) 526-1164

Sawyer County

Ed Peters, Board of Supervisors
ed.peters@sawyercountygov.org
(715) 266-2550

Meadowbrook Township

Ron Buckholtz, Chairman
(715) 943-2620

Rusk County Development

Andy Albarado, Administrative Coordinator
aalbarado@ruskcountywi.us
(715) 532-2275

Meteor Township

Clarence Frey, Clerk
clerk@townofmeteor.wi.gov
(715) 296-4366

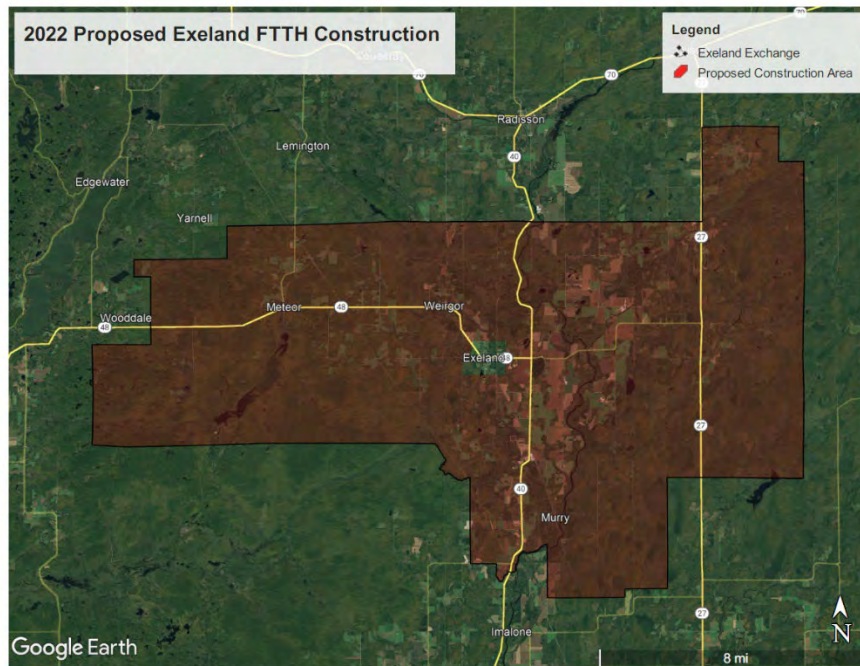
- c. The application must show that the applicant is an organization, a telecommunications utility, or a city, village, town, or county that has established a legal partnership or joint venture arrangement with an otherwise qualified organization or telecommunications utility, and as such meets the eligibility requirements set forth in Wis. Stat. § 196.504(1).

Bevcomm is a telecommunications utility authorized by the Public Service Commission of Wisconsin as documented in Appendix B of 05-TI-162, "Designation of Eligible Telecommunications Carriers, Under Part 54 of Title 47 of the Code of Federal Regulations." The utility reference for Bevcomm in Wisconsin is Indianhead Telephone Company (Utility #4860).

3.2.2 Description of the project

- a. A static map and description of the area of the State that will be affected by the proposed project.

Bevcomm is proposing a Fiber-to-the-Premise build in rural Exeland, which includes the northern portion of Rusk County to the southwestern corner of Sawyer County. The project includes the areas of Deer Lake, Summit Lake and Windfall Lake and will provide 643 underserved customers state-of-the-art Fiber-to-the-Premise services with Gigabit speeds.



The map must be accompanied by:

- b. A URL reference to a spatial file (Geodatabase / Feature Class, or Shapefile or KML) showing the proposed service area. A spatial file including census blocks that intersect the proposed project area is also acceptable.

Exhibit E includes maps of the proposed area:

- Arc GIS map: <https://arcg.is/qDqKe>
- Proposed 2022 Construction
- The geospatial file of the proposed project must be emailed to pscbanddata@wisconsin.gov by the application deadline.

Provided via email on March 14, 2022.

- PSC staff can provide support to ensure an accurate spatial file is delivered to the Commission. Please contact the State Broadband Office mapping team for mapping assistance at PSCBroadbandData@wisconsin.gov.
 - a. If the project area lies within a census block designated as served on the PSC Broadband Map, provide additional documentation to demonstrate the actual broadband service that is available in the proposed project area.

Not applicable. There are 18 homes within this footprint that are deemed as served on the Wisconsin Broadband Map. These served homes have not been included in this application, however, we will self-fund construction to these locations so that the entire Exeland exchange is served by fiber broadband.

- b. An explanation of how the proposed project will increase broadband access.

Include information about the:

- Potential and expected number of households served, including number of unserved and underserved locations.

This project proposes FTTP construction to 643 underserved locations in rural Exeland.

- Potential and expected number of businesses served, including number of unserved and underserved locations.

There are at least 48 underserved businesses and at least 104 teleworkers in the proposed project area.

- Expected number of seasonal residents and tourists served.

There are approximately 50 seasonal properties in the proposed project area. This includes cabins, rentals, and VRBO's. While it is difficult to predict the number of seasonal residents and tourists who may utilize the 50 properties, the number could be significant.

- Estimated download and upload speed of the broadband service packages available for purchase.

The proposed Rural Exeland Fiber Expansion Project: Phase One will initially enable broadband service up to 1 Gigabit download and 500 Mbps upload to be delivered to the end user. The proposed network will provide symmetric 1 Gig services that will be provisioned and can be priced on an "Individual Case Basis" until the demand for these speeds matures.

Bevcomm proposes to offer broadband in the following speed packages, which will be much faster and more reliable than that of traditional copper facilities or wireless product offerings. In addition, we participate in the Affordable Connectivity Program, offering broadband discounts to qualifying subscribers.

High Speed Internet Packages	Pricing (per month)
1 Gig Symmetrical	ICB
1 Gig/500 Mbps	\$109.95
300 Mbps/150 Mbps	\$69.95
100 Mbps/50 Mbps	\$59.95
50 Mbps/25 Mbps	\$49.95

- c. A statement whether the proposed project is targeting the “last mile,” “middle mile,” or backbone portion of the broadband infrastructure.

The proposed project includes backbone, distribution, and “last mile” fiber facilities. The project is an extension of our existing fiber network with dedicated backbone, distribution, feeder, and fiber drops in the service area.

No “middle mile” infrastructure costs are included in this application. We support sufficient “middle mile” and backhaul facilities with the capacity to deliver all proposed future “last mile” services, while following current and state federal regulations.

- d. A description of the broadband service to be provided, including estimated download and upload speeds, whether the speed is based on dedicated or shared bandwidth, and the technology that will be used. This description may be illustrated by a map or schematic diagram, as appropriate.

Our proposed design offers state-of-the art, future proof technology, using and Active Ethernet (AE) network. Superior to a design that splits or shares a neighborhood PON, this AE network will connect customers with a dedicated fiber strand to the central office electronics. Bevcomm’s 100G transport network for Internet backbone is self-healing in the event of a fiber cut or a failed component within the equipment itself. With this design, there is no oversubscription in the last mile of the network. Current and future technologies for FTTP electronics provide a quantum leap of bandwidth availability when compared to DSL or wireless technologies. FTTP will provide bandwidths of 1 Gbps (1,000 Mbps) symmetrical per subscriber today, with future technology enhancements promising to increase the capacity to 10 Gbps. Please see Exhibit D which offers a diagram of our active Ethernet network.

e. For middle mile projects:

- Identify last mile broadband service providers that will connect to the middle mile facility.
- If the participation of last mile providers is uncertain or cannot be disclosed publicly at the time of the application, describe the providers that could interconnect under appropriate circumstances.
- How long would it take for last mile connections to result?
- Describe process for use of right-of-way (ROW) in collaboration with others digging or burying facilities (Dig Once program, etc.).

Not applicable. This is a last mile proposal.

f. A schedule by which the applicant intends to complete the components of the proposed project. The project period is up to 24 months.

The proposed construction timeline and project milestones have been detailed below. The schedule is contingent upon the construction season and favorable weather conditions.

Jun 2022 – Jul 2022	Order and stage equipment
Jul 2022 – Nov 2022	Bury new backbone, distribution, and feeder fiber
Nov 2022 – May 2023	Splice fiber, cable, and terminate fiber
June 2023	Turn up fiber-based customer service

3.2.3 Itemized Budget (all amounts should be rounded to the nearest dollar)

- a. In addition to the Summary of Project Budget that is included as page 3, applicants should include a price list or quote for any equipment the applicant intends to purchase, including capital expenditures. The application should also indicate whether any facilities involved would be owned, rented, or leased.

Please reference Exhibit C which itemizes various investments and construction costs of the proposed project. Bevcomm will maintain ownership of all facilities.

- b. The application must show that the grant, if awarded, will not subsidize the expenses of a telecommunications provider or the monthly bills of telecommunications customers. For purposes of this grant program, subsidize means a contribution to the operating costs, including profit, of the telecommunications provider.

Funding requested in this application will be used exclusively for authorized purposes – to aid in the cost of construction of a FTTP network. We will not subsidize ongoing expenses or monthly bills of our subscribers. It is understood that for purposes of this

grant program, “subsidy” means a contribution of the recurring service charges and operating costs (including profit) of the telecommunications provider.

- c. The application must show that the grant funds requested will be used for the sole purpose of constructing broadband infrastructure in the underserved areas covered by the application. Construction of broadband infrastructure may include any of the following:
- Project planning that takes place during the performance period.
 - Obtaining construction permits.
 - Construction of facilities, including construction of both “middle mile” and “last mile” infrastructure.
 - Installation and testing of the broadband service.

As illustrated in the Summary of Project Budget and Funding Statement (Page 4) we are committed to using grant funds solely for the purpose of offsetting construction costs to supply fiber broadband as we extend the last mile infrastructure.

After careful consideration, we have requested a 1,709,478 (45%) match on this high-cost project. Though we have a history of successfully constructing self-funded fiber projects in our Weyerhaeuser exchange, the proposed project is especially costly due to the terrain and sparse population density. Any subsequent costs for construction including project planning, site inspections, and incremental fiber drops will be funded by Bevcomm.

3.2.4 Priority factors supporting the application

- c. **Matching funds.** A description of the matching funds the applicant will invest in the proposed project, if any. For each element, indicate the type of match (cash, salary expense, or in-kind contribution). If the application is submitted by a partnership, identify the partner responsible for providing each element of the proposed matching funds. *Note: The requirement for this information is satisfied via inclusion of the completed Funding Statement as page 4 of the application.*
- If available, provide documentation to support an offer of matching funds (minutes of a town board meeting, a letter from a prospective customer or local government official, etc.).
 - Matching funds contributions must be a firm commitment of funding to the project. Contributions that vary based on the amount of actual sales, customer contributions, or other criteria will not be given weight.

Bevcomm and partners will commit to pledge 2,089,362 (55%) of the total project

cost. We are pleased to have significant support of matching funds for this project from several partnerships, should we receive grant funding:

- Sawyer County has committed to a \$100,000 funding partnership
- Meadowbrook Township has committed to a \$13,711.58 funding partnership
- Rusk County Development has committed to a \$1,000 funding partnership

Please find documented Public-Private Partnership agreement in Exhibit B.

d. **Public-private partnerships.** If the public-private partnership is memorialized in a joint venture agreement or other writing, provide a copy of that agreement. If the partnership has not been reduced to a written agreement, provide a short description of the management role, financial commitment, or other contribution to the project for each participating partner.

- In scoring this element, information regarding active engagement of diverse communities in the planning, permitting, or marketing of the project will be given weight as well.

Please find documented Public-Private Partnership agreement in Exhibit B.

We are pleased to have significant support of matching funds for this project from several partnerships, should we receive grant funding:

- Sawyer County has committed to a \$100,000 funding partnership
- Meadowbrook Township has committed to a \$13,711.58 funding partnership
- Rusk County Development has committed to a \$1,000 funding partnership

Pledged Contributions				
#:	Entity:	Entity Type:	Pledge Type:	Pledge:
1	Rusk County	Partner	Cash	\$ 1,000.00
2	Sawyer County	Partner	Cash	\$ 100,000.00
3	Meadowbrook	Partner	Cash	\$ 13,711.58
4	Bevcomm	Applicant	Cash	\$ 1,974,650.42
5				
6				
7				
8				
9				
10				
Total:				\$ 2,089,362.00

In addition, Meteor Township has agreed to waive fees and expedite permits to ensure project efficiency. (Exhibit B)

e. **Existing broadband service.** A list of the broadband service providers, if any, currently serving the area the applicant proposes to serve. In scoring this element, the following factors will be considered:

- The degree to which the proposed project avoids duplicating existing broadband infrastructure.

The proposed project will not duplicate existing broadband infrastructure as we are the sole wireline provider in the proposed project area.

- The application of a wireless broadband service provider proposing significant overlap with existing broadband service in addition to service to an unserved area will not be given priority consideration.

The proposed project will not overlap with existing broadband service.

- Provide a list of all landline broadband service providers (DSL, cable or fiber to the home) and fixed wireless broadband service providers that overlap the footprint of the proposed broadband project.

The Wisconsin Broadband Map indicates fixed wireless service available from T-Mobile, however, in verifying eligibility of various addresses within our project, service is not available according to the T-Mobile website. There will be no wireline overlap of the footprint as the proposed project is 100% within our Indianhead Telephone Company exchange borders.

- If known, provide an estimate of the customers within the proposed footprint that are served by competing landline and fixed wireless broadband service providers, and the download/upload speeds offered by those competing service providers.

Bevcomm currently serves 65% of homes passed within the proposed project area, which is 100% within our Indianhead Telephone Company exchange borders. There have been no RDOF funds allotted for this area.

- Provide a list of mobile wireless broadband service providers that overlap the footprint of the proposed project.

The Wisconsin Broadband Map indicates Mobile Wireless solutions available from AT&T Mobility and Verizon Wireless. Their coverage maps depict 4G LTE coverage. Local Bevcomm employees indicate that residents report “cell service is no good in this area, not reliable at all.”

Jeff Engels, who resides in the proposed project area shared that he utilizes Wi-Fi calling since cell signal is very poor. Joseph Gadwell, also an area resident, feels that with a fiber connection he will have an improved experience with his cellphone utilizing Wi-Fi calling. Resident Ernest Walters shares that he currently loses cell connections often. (Exhibit G)

- If known, provide an estimate of the customers within the proposed footprint that are served by competing mobile wireless broadband service providers, and the download/upload speeds offered by those competing service providers. (The presence of existing mobile wireless providers does not contribute to or affect the evaluation of existing broadband service in the project area for purposes of priority consideration but provides a more complete picture of the broadband options available to residents.)

This information is unknown.

- For middle mile projects, describe the unserved and underserved areas that the middle mile route will transit. In scoring this element, the following factors will be taken into account:
 - The number of unserved and underserved service locations that could potentially connect through the proposed middle mile route.
 - The degree to which the middle mile route will reduce the cost of extending fiber to the premises broadband service to business and residential service locations in an unserved or underserved area.
 - The degree to which the proposed middle mile route avoids duplicating existing and planned fiber to the premises broadband infrastructure.

Not applicable. This is a last mile proposal.

- f. **Project impact.** A description of the geographic area and the population, both in terms of absolute numbers and likely users, which will be served by the proposed project. Indicate the number of anticipated residential and business customers in the project area, if known. Explain the speed and quality of internet service that will be available. Include information about the range of packages available for purchase. Provide details on any low-income access programs and steps the project will take to support adoption.

The proposed project area in rural Exeland includes the northern portion of Rusk County to the southwestern corner of Sawyer County. This includes the areas of Deer Lake, Summit Lake, and Windfall Lake.

The project proposes infrastructure running from our Exeland Central Office going west on Hwy 48, north and south on state Hwy 40, and east to Hwy 27. The project area covers

538 locations in Sawyer County and 105 locations in northern Rusk County. The FTTP technology proposed for this project will supply advanced bandwidth delivery to an expected 643 locations, including at least 48 businesses and at least 104 teleworkers.

Upon completion, the new infrastructure will supply residential and business packages with reliable, unlimited data ranging from 50 x 25 Mbps up to 1 Gbps x 500 Mbps, with symmetrical service available on an individual case basis.

In support of this project, Senator Jerry Petrowski writes, “Bevcomm has presented me with a broadband plan for portions of Rusk and Sawyer Counties in Northcentral Wisconsin that would address the lack of Internet access and connectivity in the rural areas around the Village of Exeland. I am writing to express my full support of the Broadband Expansion Grant application for Bevcomm, which plays an integral part in helping bring these crucial services to my constituents.” (Exhibit F)

Bevcomm is a participant of both the Affordable Connectivity Program and Federal Lifeline Programs, offering qualified customers significant broadband discounts.

Should this application be successful, Bevcomm will contact all eligible households and businesses to inform, educate, and share the new broadband options available to them. In addition, we offer educational material to support the project.

g. **Scalability.** A description of how the proposed project could expand or improve the broadband service it delivers, while maintaining the quality of its broadband service. This description should include specific projected increases in the following parameters that are known at the time of the application:

- The number of users.
 - The number of network nodes.
 - The number of services provided.
 - The geographic area served by the project.
 - The number of aggregation points in middle mile project.
- This description may also include a discussion of growth potential that is outside the commitment the applicant is making as part of its application.

For middle mile projects, describe the spare or unused fiber capacity in the route and any future projects planned to use that capacity in the future.

For purposes of the question, planning can mean either specific uses already the subject of contract or serious negotiation, or tentative uses that may or may not actually be contracted for in the future.

Should funding be awarded, this rural area surrounding Exeland will have the same

connectivity, speeds, and features available as all other fiber subscribers in our rural Weyerhaeuser exchange. We are proposing a broadband network that will offer an improved quality and a reliable communication infrastructure to expand education and work-from-home capabilities, along with access to modern healthcare opportunities.

The project will offer FTTP-based broadband service to 643 underserved locations. Homes and businesses passed will have the opportunity to access speeds up to 1 Gigabit download by 500 Mbps upload upon launch, with speeds up to symmetrical Gig and beyond in the future.

The proposed Rural Exeland Fiber Expansion Project will supply an ultramodern broadband network, replacing the current aging copper plant. We will use one FTTP electronics node, with augmentation in the future.

Services supplied will include broadband, voice, calling features, and long-distance calling. Users will have an opportunity to take part in over-the-top applications without bandwidth limitations.

The proposed project will build a new Fiber-to-the-Premise infrastructure from our Exeland Central Office going west on Hwy 48, north and south on state Hwy 40, and east to Hwy 27 in portions of Rusk and Sawyer Counties. This includes the areas of Deer Lake, Summit Lake, and Windfall Lake.

Construction and IP-network standards are chosen to allow scalable design, management, and operations at every step of the process. We can place additional nodes, replace electronics, and introduce new services that will allow subscribers access to worldwide locations and content. Current and planned facilities can support future infrastructure within additional neighborhoods in areas immediately surrounding our Indianhead Telephone Company Exchange.

Should we be awarded funding for this project, it will complete the fiber build out in 100% of our rural Exeland exchange.

- h. **Economic development.** A description of how the proposed project will promote job growth or retention, expand the property tax base or improve the overall economic vitality of the municipality or region. This description may be supplemented with a letter from one or more persons discussing the potential economic impact the project could have for that individual or business. In scoring this element, the following factors will be considered:

- A discussion of potential economic impact the project could have for an individual business located in the project area.

This project will retain and promote rural economic development by providing access to fiber broadband to 100% of locations within the proposed footprint. Rusk County Administrator, Andy Albarado, stated in his letter of support, “We feel strongly that this project will enable greater collaboration and teamwork between community service centers, public safety offices, and county and municipal offices. In addition, it will aid the County’s economic growth and development as it will spur job growth as well as support and enhance telecommuting opportunities in and around Rusk County.” (Exhibit F)

As many jobs have moved from reporting to a physical office to a remote online setting, employees face new opportunities – both as to where they can work, and where they can live. A fiber infrastructure will help retain existing residents as well as attract new seasonal and permanent residences. In collecting responses from our Fiber Interest Survey (Exhibit G), we found that many residents would appreciate the opportunity to work from their homes and/or cabins with an improved broadband connection. Seasonal resident Elain Braun comments, “I would love to work from [my] cabin but cannot get enough bandwidth.” Similarly, Steve Kjellberg says he would relocate permanently to his cabin if fiber was available for both he and his wife to work from home. Frank Fenby’s family is planning a move to Exeland in March of 2022. Both Frank and his wife utilize video streaming platforms for work and expressed interest in this project.

The Winter Area Chamber of Commerce Board supports this project and shared, “There are many businesses, students, and community members who will benefit from improved internet access, particularly in the Southeastern part of Sawyer County, and we believe this project will have significant, positive impact on the businesses and community members we serve.” (Exhibit F)

A connected school is one of the key motivators of economic development within a rural community. District Administrator, Patrick Struzel, states “By enhancing the broadband service to all families in the School District of Bruce, remote or on-line education will be equitable for all students.” (Exhibit F)

- An explanation of how an improved download and upload transmission speed could better support a specific business in the project area.

From small business owners who home-office to business owners with storefronts, a better broadband represents progress, efficiency, and accessibility. Business owners cannot function, much less thrive, with dropped video during meetings, downed credit card machines, glitchy streaming, lag times, and interrupted speeds.

Greg Johnson, from rural Exeland, shared that he operates three area businesses and describes his Internet usage as “heavy.” He has been unable to participate in online courses with his current broadband and would appreciate a more reliable connection to track his various business operations. James Pederson, with Jascope Medical comments, “Current broadband is slow and inconsistent making it hard to run a business. [I] need more reliable [Internet] for meetings and communication.” The owners of North Star Acres comment that they could use faster Internet. They not only have multiple family members and employees sharing the service on their large area dairy farm during business hours, but many employees live on site - so need an Internet that can support personal use such as virtual appointments, connecting with relatives, and entertainment. (Exhibit G)

- An explanation of the likely impact improved broadband service could have on residential property values, supported by local sales data if available.

Rick and Cherie Jenkins, Brokers and Owners of Jenkins Realty, Inc, of Rice Lake submitted a letter of support for this project. (Exhibit F) Cherie writes, “I can personally attest to the importance of quality bandwidth as it relates to the home values within our region. There are many great homes in this part of our state that unfortunately tend to get overlooked due to the fact that there is limited internet access at the location. This increases time on the market and can lead to price decreases before the property gets sold, even if the home was priced correctly for the market at the time of listing.” She continues, “A fiber infrastructure is an investment in our current residents, as well as a draw for potential full-time and seasonal residents in north central Wisconsin.”

Broadband is a housing necessity – no longer an amenity – and will most certainly raise housing values as well as the property tax base. The addition of reliable, quality broadband will encourage residents and businesses to remain as well as entice telecommuters to live, stay, work, and spend in the rural Exeland area.

- A demonstration of how improved broadband service to a residential portion of the project could benefit a telecommuting population.

An improved broadband will benefit and retain existing telecommuters – as well as attract new telecommuters to the area. Based on our Fiber Interest Survey, 42% (104 people) reported at least one family member who relies on their broadband to work from home. (Exhibit A) Telecommuters are struggling to do their jobs with their existing speeds. Below, please find comments shared by residents in the proposed project area regarding their current experience telecommuting.

(Exhibit G)

- VPN access draws down speed, so the 2nd person can't work from home. Faster speed would allow both of us to work from home. Considered moving because we both aren't able to work from home.
- Current internet is slow and unreliable. Lost money on business deals and wife almost lost her job because of slow internet.
- Moving to Exeland in March 2022. Both use Zoom for work.
- When I move there permanently, faster/reliable [Internet] would be so much better for working.
- Work on Zoom, need faster speed to remain competitive with larger cities.
- I work in the stock market, and I need a faster connection, time, upload, and download. Video chat is terrible.
- Reliability is critical in communicating with my clients around the world. Current service cannot give me that.
- Full time work from home, need faster speeds [for] video conferencing. Employer now allows work from home. Need reliable and faster speeds for larger files and Zoom meetings.
- Get "low bandwidth" messages occasionally, buffering while streaming, working more from home.
- Always using the internet to conduct video calls, use VOIP and stream significant media content. Would love not to have to coordinate with others [in the house] to connect for performance and stability.
- Use for video conferences, [need] fewer dropped VOIP calls, [need] faster speed enabling real-time collaboration.
- Extremely hard to run more than one device on current speed.
- Faster service will improve job performance with less downtime and buffering.
- With working from home, I need a reliable service for Zoom/Teams meetings
- Internet not reliable now, faster/reliable [Internet] would improve work life
- Turned down working from home because of poor Internet.
- As a freelance author, would be able to transfer manuscripts to editors and publishers.

Gigabit bandwidth will enhance the satisfaction, productivity, and quality of work for this diverse group of telecommuters.

A demonstration of how the speeds and service being offered by the project fits with current and future economic needs of the community and local businesses.

The proposed project will no doubt boost the current and future economic needs of the community and local businesses. The Winter Area Chamber of Commerce Board stated

in a letter of support, “There are many businesses, students, and community members who will benefit from improved internet access, particularly in the south-eastern part of Sawyer County, and we believe this project will have significant, positive impact on the businesses and community members we serve.” (Exhibit F)

James Pedersen, with Jascop Medical, responded to our Internet Interest Survey and said, “Current broadband is slow and inconsistent making it hard to run a business.” Jascop Medical, like all businesses, needs a reliable connection for online meetings and communication. Danielle Maire shares a home with the owner of Fully Torqued Customs, LLC, Danielle uses their shared internet connection for online schooling and her boyfriend competes for bandwidth to run his business. Cyndy Patton has an online Etsy business. Cyndy contributed to our survey and indicated that she is in favor of a fiber Internet. (Exhibit G)

Area resident, Brandon Blicharz shared this in his letter of support for this project, “All in all, modern life has increasingly required online connections, and any chance at higher speeds would greatly improve quality in rural areas, especially in the Exeland area. Many homes on Lund, Druwe, and Nail Creek Road(s) are left with only Bevcomm’s limited speed offerings or satellite internet, which may be faster at times but is extremely unreliable. I believe that Bevcomm increasing their offerings to include Fiber Internet would be an excellent addition to the Exeland area. Life for our population, both young and old, working from home, farming, or retired, would be improved without a doubt.” (Exhibit F)

This project will retain and promote rural economic development by providing access to fiber broadband to 100% of locations within the proposed footprint. The development and adoption of superior fiber broadband will:

- Provide home-based business solutions as connectivity replaces travel.
- Improve production in the agricultural community.
- Stimulate economic growth in and around the project area.
- Increase home values as broadband access takes on more prominence as a required housing amenity.
- Inspire innovation and investment in local commerce.
- Encourage population retention and growth.

- i. **Effect upon broadband service to adjacent areas.** A description of whether the proposed project will or will not impair the ability of a broadband service provider or competing broadband service provider to extend broadband service to areas adjacent to the proposed project area.

The proposed project will not impair the ability of a broadband service provider or competing broadband service provider to extend service areas adjacent to the project area. Improving infrastructure in the rural Exeland area may encourage surrounding providers to do the same – promoting better broadband and economic growth in the entire region.

3.2.5 Other information supporting the application

- a. A description of applicant's history or experience constructing broadband communications facilities in the State and elsewhere.
- If applicable, an applicant must comment upon the status of all prior broadband expansion grant projects, including the type of broadband technology used, the facility route actually built or installed, the number of residential and business customers actually connected, and other relevant details of the prior project(s).
An applicant may also comment on broadband construction projects undertaken in prior years that were not funded in part by the Broadband Expansion Grant program.

At Bevcomm, we have extensive experience constructing broadband communications. We focus on reinvesting in technology in the communities we serve by developing state-of-the-art networks. Our core services are deployed to customers utilizing extensive broadband networks including multiple fully redundant 100 Gig Ethernet transport rings that are constructed to survive fiber cuts and multiple equipment failures. Recent examples of successfully completed fiber projects in the state of Wisconsin include:

- Recipient FY2016 WI PSC Broadband Expansion Grant, Diamond Bluff, Hager City, WI: Fiber has been successfully deployed to 35 households, as was outlined in our initial application. In addition, we invested 100% of the construction cost to expand this area to include an additional 30 homes west of the Village of Diamond Bluff.
- Recipient FY2018 WI PSC Broadband Expansion Grant, Island Lake Project, Weyerhaeuser, WI: Fiber has been successfully deployed to 129 homes and businesses within the project area.
- Recipient FY2018 WI PSC Broadband Expansion Grant, Rural Diamond Bluff Expansion Project, Hager City, WI: Fiber connectivity was successfully deployed to 130 locations within the project area.
- Recipient FY2019 WI PSC Broadband Expansion Grant, Rural Diamond Bluff Completion Project, Hager City, WI: Fiber connectivity was successfully deployed to 201 locations within the project area.
- Recipient FY2020 WI PSC Broadband Expansion Grant, Potato Lake Fiber Expansion, Weyerhaeuser, WI: Fiber connectivity was successfully deployed to 146 locations.

- Recipient FY2020 WI PSC Broadband Expansion Grant, Towns of Trenton and Hartland Fiber Expansion Project, Hager City, WI: Fiber connectivity was successfully deployed to 168 locations.
- Self-funded construction to the City of Radisson: Fiber connectivity was successfully deployed to 200 locations.
- Self-funded construction to the rural Island Lake Area: As an extension of our Island Lake grant project, we continued construction and successfully connected 100 locations.
- Self-funded construction to Pieper/Chief Lake area: Fiber connectivity was successfully deployed to 270 locations.
- Self-funded fiber construction to west of the Village of Weyerhaeuser: Fiber connectivity to 75 locations.

- b. A description of how the proposed project will or will not duplicate existing broadband infrastructure.

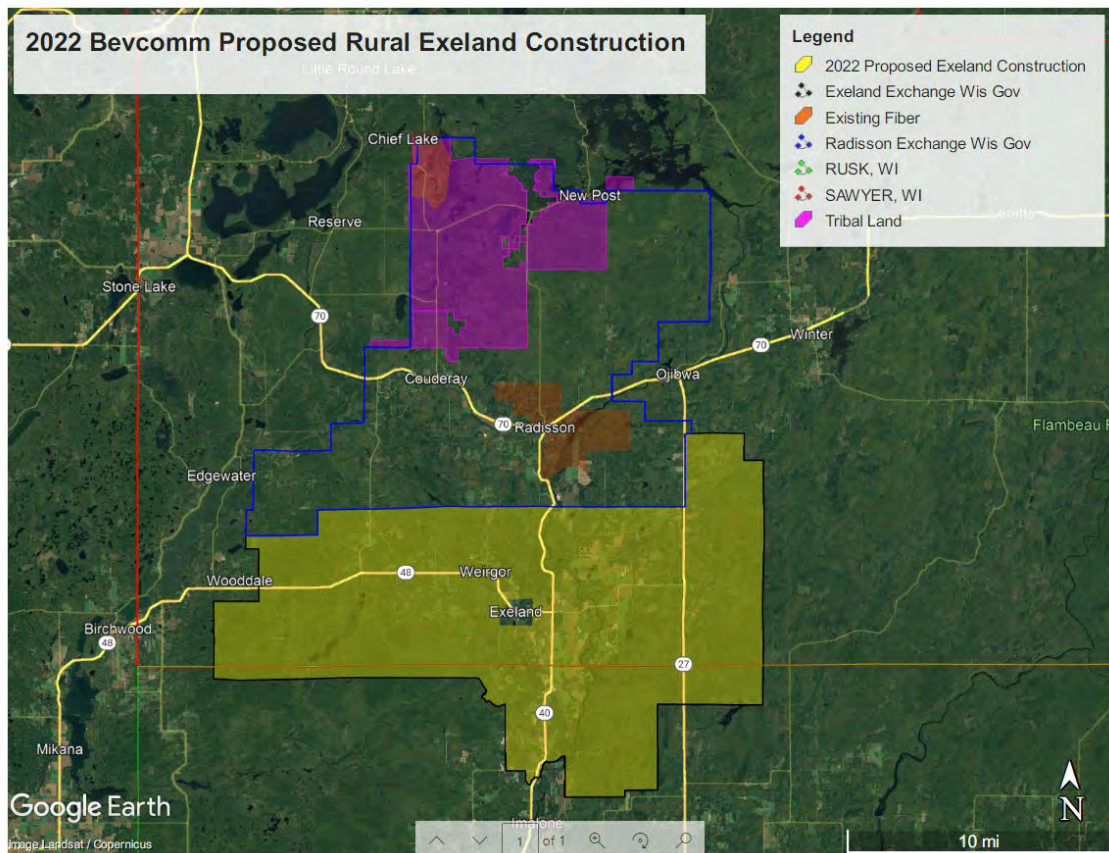
This project will replace, but not duplicate, existing broadband infrastructure. Existing facilities do not meet the PSCW forward-looking definition of broadband. This future-proof plan will install fiber services that will initially provide 1 Gbps broadband service to end users, with the potential for enhanced speeds in the future.

- c. A description of an applicant's financial ability to undertake the proposed broadband construction project.

This may include information such as the number of years the company has been in operation, documentation of successful completion of similar infrastructure projects, evidence that sufficient funds are available to cover project expenditure and match, customer turn-over rates, and credit rating.

Bevcomm has been in operation for more than 125 years. We have a history of self-funding fiber expansion projects in our Wisconsin exchanges and only make a practice of asking for support in unique circumstances. We point specifically to the successful history with previous Wisconsin Broadband Expansion Grants, and our annual PSCW Annual Questionnaire filings, which show our continuing regulated and non-regulated revenue streams over the years.

In the map below, you will see a depiction of Bevcomm's recent and proposed fiber construction projects. The Tribal land noted in the map depicts the area planned in a Phase Two of the project proposed in this application. We are currently in conversation with the Lac Courte Oreilles Tribal Government and are working towards making



- d. For middle mile projects, state the terms under which the applicant will make its middle mile fiber resource available to last mile providers. Without disclosing project-specific or customer-specific negotiated rates for service or access, state whether access to the middle mile fiber resource will be offered to last mile providers at a rate that is reasonable and common to the industry. Describe any restrictions or limits that may limit the availability or interconnection with the middle mile route.

Not applicable. This is a last mile proposal.

- e. For middle mile routes, state the amount of fiber capacity, by number of fiber strands in a cable, that the applicant has been reserved for public use. Describe any commitment or tentative discussion indicating the local government or State agency that might use those fiber strands, and for what purpose. Describe any restrictions or limits that may limit public use (e.g., a possible use conflicts with an existing program covering the same subject matter).

Not applicable. This is a last mile proposal.

- f. A description of how the proposed project will affect the ability of individuals to access health care service from home, including any impact upon the costs of those services.
- Specific information from a hospital or clinic in the project area that currently uses or intends to use home-based telemedicine equipment to enhance access health care service would best illustrate this point.

Many residents (42%) within the proposed project area who responded to our Fiber Interest Survey highlighted that they rely on their Internet connection to access health care services from home. Virtual visits to doctors may be less costly than (and as effective as) in-person visits. Here are just a few of the comments collected that highlight how residents use the internet for healthcare (Exhibit G):

- Used for C-pap and Telehealth
- Online Doctor for Blood Cancer
- Paralyzed vocal cord exercises. Uses online medical – less waiting with better internet.
- Faster speed would help with zoom support groups for terminal illness.
- Had a lot of issues with virtual appointment with doctors – would be able to avoid traveling to see the doctors.
- Used for telehealth for son with mental health issues
- Use for monitoring oxygen and pulse rates, better communication [needed] with medical facilities
- Better internet needed for monitoring deliberator and online visits
- Better internet needed for Dr. appointments and meds through the VA – Disabled Vet.
- Use online clinic but sometimes the connection is just too slow – need reliability
- Use for virtual doctor that drops often
- Use for online clinic and pacemaker
- Use internet for telehealth, which drops during meetings
- Used for online medical for diabetes
- Use internet with no drops, better medical meetings, better picture quality
- Need better speed for doctor/oncology visits with data exchange.
- Web Medical and online appointments drop because of slow internet speeds
- Used for virtual doctor appointments, pacemaker, and glucose monitor
- Not able to do virtual dr. appointments due to slow internet.
- Use medical portals for dr. appointments
- Virtual doctor appointments, cuts in and out, needs more speed
- Life Alert Monitor

Dave Hamilton responded to our Fiber Interest Survey and works for medical professionals. He reports using the internet a lot and receives many crises calls, making his connection even more imperative. (Exhibit G)

g. A description of how the proposed project will affect the ability of students to access educational opportunities from home.

- Specific information on the likely number of students that will benefit from improved access to educational opportunities from home would be useful.

According to our Fiber Interest Survey results (Exhibit A), 31% of those responding in the proposed service area report utilizing online educational tools and services for K-12 homework assignments, traditional and online college courses, and eLearning courses.

- Specific information regarding educational programs that are currently available for students in the project area would be useful.

We live in a time where a robust broadband connection is imperative to the success of all students from pre-k – adult learners. Students who are limited to a connection while attending in-person school are at a distinct disadvantage from their peers who have access at home. This proposed project will deliver Gigabit speeds with future-proof technology so that students may collaborate, research, and access the many educational tools that are delivered online. This technology will eliminate the frustrations of sharing connections with others in the household who are also using bandwidth to learn and work.

All students, young and old, in the proposed project area will benefit from improved access at home. Of those who responded to our Fiber Interest Survey (Exhibit G) report the need for an improved connection for education at home. Here are some of the comments they shared:

- Daycare children taking classes online, less buffering
- A teacher using for virtual schooling – current internet does not work well for that – also has children using for online classes
- I am a teacher and need reliable internet for virtual class days.
- Being a teacher, I currently can't keep all student's cameras up on zoom. Can't open, run, use helpful online platforms without losing streaming/connection.
- Teacher who uses zoom meets. Faster [connections] would allow me to conduct online classes more reliably. Currently, I lose connection and video buffers
- Extremely hard to run more than one device with current speeds.
- Take online college courses that have lag time
- Need more [Internet] due to grade school online services
- Has delays, not enough bandwidth for All kids with virtual school

- Heavy Internet usage could not take online courses.
- Need consistent speeds and reliability and would consider eLearning if it [the internet] were able to do it
- Grandkids use for online schooling
- Loads slowly for online classes
- [Need] less time downloading, continuing education for employment
- Need better connection – less interruption.

Bruce Public Schools District Administrator, Partrick Sturzl, shares, “School districts learned how to switch to remote teaching during the pandemic quickly. However, broadband service throughout the school district ranged from very good to non-existent. The district bought hot spots for some of our families to use at their homes. Some of the hot spots were incapable of providing proper internet access due to the lack of cell towers in our rural northern Wisconsin school district. The students who did not have internet capabilities suffered greatly because they did not have daily contact with their teachers and peers. By enhancing the broadband service to all families in the School District of Bruce, remote or on-line education will be equitable for all students. Furthermore, virtual learning will continue as an important part of public education for years to come.” (Exhibit F)

A description of actions taken by a city, village, town, or county in support of the grant application that have not been discussed in the context of a public-private partnership above, including but not limited to:

- The contribution of funds, easements or permissions to use publicly owned real estate, construction materials, or other items of value to the grant project.
- The contribution of in-kind assistance to the grant project in the form of waived fees and expenses for obtaining use permits and permissions.
- The contribution of other items of benefit to the grant project, such as public outreach and education, vehicles, water, etc.
- Certification as a Broadband Forward! Community or Telecommuter Forward! Community.

The Town of Weirgor has offered their support of Bevcomm’s application to expand broadband. Town Clerk, Michele Meyers writes, “It is believed that this project would improve the internet services for our landowners. The upgrade should improve the quality and quantity of broadband services that is needed to keep up with the increase of need for in home internet service for work and school.” (Exhibit F)

The Rusk County Community Library extended their support for this project in a support letter. Library Director Christinna Swearingen writes, “There are many ways in which this improved connection will allow residents to utilize the resources our library has to

offer from the safety and comfort of their own homes.” Ms. Swearingen goes on to say, “Rusk County Residents are in need of connectivity in order to keep up with the conveniences of modern day, whether it be to access an educational program offered through the Library, our online catalog, apply for jobs, learn a new language or even earn a degree. In a world that is increasingly connected, the poor (or more often, lack of) internet connection can often hold residents back from being able to stay socially connected, better themselves, or even do such simple things as renewing their license plates online. The Library provides many services, including free Wi-Fi but often this can be difficult for residents to access if there is travel involved, and in an area such as this, there is often some sort of travel involved. I believe that without access to connectivity, we do this portion of Wisconsin a huge disservice.” (Exhibit F)

The Administrative Coordinator for Rusk County Development writes, “We feel strongly that this project will enable greater collaboration and teamwork between community service centers, public safety offices, county and municipal offices. In addition, it will spur job growth as well as support and enhance telecommuting opportunities in and around Rusk County.” (Exhibit F)

Sawyer County is a Broadband Forward! and Telecommuter Forward! Community.

- h. Letters and messages in support of the application submitted by prospective customers, local government officials, and other interested persons.

We were pleased to receive the support and feedback from 38% of residents surveyed. A complete tally of those responses can be found in Exhibit A. Support was also gathered from Wisconsin State Senator, Jerry Petrowski’s office, and State Representative James Edming, who writes in his support letter, “I am excited to see Bevcomm willing to make such a major investment in broadband in this area. However, without the requested funding from the Broadband Expansion Grant Program, it will not be financially feasible for them to pursue this much-needed project.” (Exhibit F)

- i. Any other equitable factor that the applicant desires to discuss, including one or more of the factors in Wis. Stat. § 196.03(6) that the applicant believes its project would advance. In discussing this element, the following information may be useful:

- Technical support and training materials that the applicant intends to provide.

We take considerable pride in our customer service and offer free Internet and email technical support 24 hours per day, 365 days per year.

- Information that the applicant intends to use to promote better broadband adoption and use.

We offer educational materials, as well as information regarding the construction and benefits of fiber broadband.

A description of a program or outreach to provide assistance to individuals of low income.

We are compelled to give back to the communities we serve, not only is it our corporate responsibility, but it is the true culture of our company.

We participate in the Affordable Connectivity Program and the Federal Lifeline Program and proudly support local non-profits and service organizations such as the local area Chamber of Commerce, numerous recreational teams of all ages, our local schools, church fundraisers, community celebrations, and much more.

Bevcomm is committed to working toward overall community enhancement that includes improving broadband access for residents, businesses, and community anchor institutions within Sawyer and Rusk Counties. The availability of high-speed broadband service will give residents access to a vast array of new information and resources relating directly to potential employment/telework, telehealth, education, and business opportunities, as well as additional sources for news and entertainment.

Additional support can be found in the attached exhibits: Fiber Interest Survey Summary (Exhibit A), letters in support of this project (Exhibit F), a map of the proposed project (Exhibit E), and Public-Private Partnership Agreements (Exhibit B).

Thank you for your time and consideration. Should you have any questions regarding our proposal, please contact John Sonnek at 507-526-1164 or email jsonnek@bevcomm.com.